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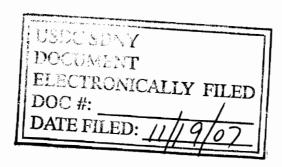
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November 19, 2007

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The Hon. Gerard E. Lynch, U.S.D.J. The U.S. Courthouse 500 Pearl Street, New York, NY

RE:

Scan AM Transport A/S v. M/V GOLDEN CLOUD

07 Civ. 6062 (GEL) (S.D.N.Y.) - Our File: 9014/PMK

Your Honor:

We are the attorneys for defendant, EVERGREEN MARINE CORP. (TAIWAN) LTD., sued herein as EVERGREEN MARINE CORPORATION.

We have conferred with opposing counsel and propose the following schedule for Evergreen's motion to dismiss:

12/07/07:

Last day for defendant to serve motion;

01/08/08:

Last day for plaintiff to serve opposing papers;

01/15/08:

Last day for defendant to serve reply papers.

Respectfully.

CICHANOWICZ CALLAN KEANE **VENGROW & TEXTOR, LLP**

Cc by email to:

Samuel C. Coluzzi, Esq., SColuzzi@nicolettihomig.com

Attorney for Plaintiff